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Counsel for *Santa Rosa Mall, LLC*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

STATEMENT CERTIFYING COMPLIANCE

(Related Docket Nos. 6316, 6317)

TO THE HONORABLE COURT:

COMES NOW Santa Rosa Mall, LLC (“Santa Rosa”), by and through its undersigned counsel, and respectfully states and prays as follows:

1. On January 7, 2020, Santa Rosa filed a *Motion for Leave to File Under Seal* (Docket No. 6316) and redacted *Motion for and an Order Finding the Automatic Stay Inapplicable or, in the Alternative, for Relief from the Automatic Stay and Memorandum in Support Thereof* (the “*Relief from Stay Motion*”, Docket No. 6317)¹.

2. On February 20, 2020, Debtors’ counsel informed the Court that the “confidential” designation of that certain *Confidential Settlement and Release Agreement* was removed.

3. On even date, the Court requested Santa Rosa file an unredacted version of the *Relief from Stay Motion* on the public docket.

4. In compliance, we attach as **Exhibit A** an unredacted *Relief from Stay Motion* together with

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Relief from Stay Motion*.

all exhibits in support thereof.

5. On February 21, 2020, copies were provided to the Clerk of the United States Bankruptcy Court located at 300 Quarropas Street, White Plains, NY, in an envelope marked “TO BE FILED UNDER SEAL.”

WHEREFORE, Santa Rosa respectfully requests this Court takes notice of the forgoing.

Respectfully submitted.
Dated: February 21, 2020

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